

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICHAEL S. KIMM, ESQ. (MK4476)
KIM E. SPARANO, ESQ.
KIMM LAW FIRM
41 BANCER STREET
ENGLEWOOD, NEW JERSEY 07631
TEL: 201-342-3377
FAX: 201-342-0555
Attorneys for Plaintiffs

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>12/27/07</u>
--

HO MYUNG MOOLSAN CO., LTD., :
and HYUN-SONG KANG, :

07 CV 7483 (RJH)

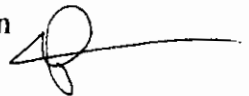
Plaintiffs, :

v. :

MANITOU MINERAL WATER, INC., :
RAPHAEL DRUG AND HEALTH CO. :
O-YOON KWON; NAM-IN JHON, :
HANMI HOME SHOPPING COMPANY, :
NEW JERSEY FLEA MARKET NEWS, :
NEW YORK FLEA MARKET NEWS, :
a/k/a WWW.FINDALLUSA.COM, :
JOHN DOES 1 THROUGH 10, :
JANE DOES 1 THROUGH 10, and :
ABC COMPANIES 1 THROUGH 100, :

Defendants. :

Joint Discovery Plan
and Order



The parties having conducted a discovery conference pursuant to Rule 26(f) of
the Federal Rules of Civil Procedure, the parties propose the following discovery

schedule:

(1) Disclosures under Rule 26(a) are to be made:

by December 14, 2007

(2) Scope of discovery covers liability and damages and:

A. All paper discovery is to be completed by March 30, 2008;

B. All fact depositions are to be completed by April 30, 2008;

C. All expert written discovery are to be completed by May 30, 2008;

D. All expert depositions are to be completed by June 30, 2008.

(3) A case management conference should be held by the Court ^{on} ~~during~~ June 6
2008. *at 10:00 a.m.*

Dated: December 12, 2007

/s/ Michael S. Kimm
Attorneys for Plaintiff

/s/ Andrew Kimler
Attorneys for Defendants

SO ORDERED
GR 1.4 hrs
12/20/07